

UNITED STATES DISTRICT COURT

for the
Eastern District of MichiganIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Case No. 20-mc-50138-7

INFORMATION ASSOCIATED WITH
RKOUZA@GMAIL.COM, RAMISKOUZA@GMAIL.COM,
ERDRUGTAYLOR@GMAIL.COM, AND
JUSTINJARBO@GMAIL.COM THAT IS STORED AT
PREMISES CONTROLLED BY GOOGLE

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the Northern District of California.
(identify the person or describe the property to be searched and give its location):

See ATTACHMENT A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):

See ATTACHMENT B.

I hereby certify that the foregoing is a certified copy
of the original on file in this office.Clerk, U.S. District Court
Eastern District of MichiganBy: Eddrey O. Butts
DeputyYOU ARE COMMANDED to execute this warrant on or before April 20, 2020 (not to exceed 14 days)☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to the presiding United States Magistrate Judge on duty.
(United States Magistrate Judge)☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of Date and time issued: April 6, 2020 2:25 pm

Judge's signature

City and state: Detroit, MichiganDavid R. Grand U. S. Magistrate Judge
Printed name and title



Department of Health and Human Services
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS



REPORT OF INVESTIGATIVE ACTIVITY

An investigative activity was conducted on 4/6/2020 by Special Agent Michael Pemberton, HHS-OIG. The following was the nature of the activity:

Reporting agent served Google, LLC with an electronic search warrant (Attached).

Investigative Activity conducted on 4/6/2020 At Google Law Enforcement Website
By Michael Pemberton, HHS-OIG SA Phone Number 313.392.8015
Date Prepared 4/6/2020 By Michael Pemberton Case Number 5-18-0-0100-9

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From: lers@google.com
To: [Pemberton, Michael A \(OIG/OI\)](#)
Subject: LERS Submission Confirmation - Google Reference. No. 3647037
Date: Monday, April 6, 2020 3:16:36 PM

CAUTION: External email. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This is an automated response to advise you that Google Legal Investigations Support has successfully received your legal request submission.

Google receives a very high volume of legal process every day. The team processes legal requests in the order that we receive them. You may monitor the status of your request by logging into [your LERS account](#).

If your request relates to exigent circumstances or if you have further questions, please email USLawEnforcement@google.com and include the Google reference number listed in the subject line. Please include a description of the exigency or your question(s) so that we may assess your request accordingly.

Regards,
Google Legal Investigations Support

ATTACHMENT A – PREMISES TO BE SEARCHED

The premises to be searched and seized are:

(a) the email hosting accounts identified by the email addresses domain names rkouza@gmail.com, ramiskouza@gmail.com, erdrugtaylor@gmail.com, and justinjarbo@gmail.com, including all of its email accounts; (b) other user-generated data stored with that hosting accounts and its associated email accounts; and (c) associated subscriber, transactional, user connection information associated with the hosting accounts and its associated email accounts, as described further in Attachment B. This information is maintained by Google LLC, which accepts service of process at Google, LLC, 1600 Amphitheatre Parkway, Mountain View, California, 94043 and fax number 650-249-3429.

ATTACHMENT B – ITEMS TO BE SEIZED

ATTACHMENT B

The term EMAIL PROVIDER refers to Google, LLC.

I. Search Procedure

- A. Within fourteen days of the search warrant's issue, the warrant will be served on the EMAIL PROVIDER'S personnel, who will identify the accounts and files to be searched, as described in Section II below.
- B. The EMAIL PROVIDER will then create an exact electronic duplicate of these accounts and files ("the account duplicate").
- C. The EMAIL PROVIDER will provide the account duplicate to law enforcement personnel.
- D. Law enforcement personnel will then search the account duplicate for the records and data to be seized, which are described in Section III below.
- E. Law enforcement personnel may review the account duplicate, even if the EMAIL PROVIDER produces it more than 14 days after the warrant issues, subject to the following limitations. If the EMAIL PROVIDER provided data that was created after fourteen days from

the warrant's issue ("late-created data"), law enforcement personnel may view all late-created data that was created by the EMAIL PROVIDER, including subscriber, IP address, logging, and other transactional data, without a further order of the Court. Law enforcement personnel will seek to avoid reviewing any late-created data that was created by or received by the account holder(s), such as email, absent a follow-up warrant.

II. Accounts and Files to Be Copied by the EMAIL PROVIDER'S Personnel

A. All data files associated with the email address or accounts rkouza@gmail.com, ramiskouza@gmail.com, erdrugtaylor@gmail.com, and justinjarbo@gmail.com, including, without limitation:

1. The contents of all email, whether draft, deleted, sent, or received;
2. The contents of all text or instant messages;
3. The contents of all electronic data files, whether word-processing, spreadsheet, image, video, or any other content;

4. The contents of all calendar data;
5. Lists of friends, buddies, contacts, or other subscribers;
6. Records pertaining to communications between the EMAIL PROVIDER and any person regarding these accounts and any email accounts associated with those addresses, including, without limitation, contacts with support services and records of actions taken.

B. All subscriber and transactional records for this email account and any associated email accounts, including:

1. Subscriber information for these and any associated email

accounts:

- a. Name(s) and account identifiers;
- b. Address(es);
- c. Records of session times and durations;
- d. Length of service (including start date) and types of service utilized;
- e. Telephone instrument number of other subscriber number

- or identity, including any temporary assigned network address;
 - f. The means and source of payment for such service (including any credit card or bank account number); and
 - g. The Internet Protocol address used by the subscriber to register the account or otherwise initiate service.
2. User connection logs for any connections to or from this and any associated email accounts, including:
- a. Connection time and date;
 - b. Disconnect time and date;
 - c. The IP address that was used when the user connected to the service;
 - d. Source and destination of any email messages sent from or received by the account, and the date, time, and length of the message; and
 - e. Any address to which email was or is to be forwarded from the account or email address.

III. Records and Data to be Searched and Seized by Law Enforcement

Personnel

A. Evidence, fruits, or instrumentalities of violations of Title 18, United States Code, Section 1347, Health Care Fraud; Title 18, United States Code, Section 1343, Wire Fraud; and Title 18, United States Code, Section 1349, Conspiracy to Commit Health Care Fraud and Wire Fraud, including records from 2010 through the present relating to:

1. the identities of Colosseum Inc./ER Drugs, NRK RX, INC./Food Town Drugs, IRXPLUS.COM, INC./St. Paul Pharmacy, Seaway Pharmacy, and Rockwood Pharmacy's (hereafter "Subject Pharmacies") employees, agents, representatives, contractors, and consultants;
2. the marketing and promotion of Subject Pharmacies services;
3. payments by, or on behalf of, Subject Pharmacies to pharmaceutical wholesalers, entities, or others;
4. services performed by entities on behalf of Subject Pharmacies;
5. orders for medication and billing federally funded healthcare programs;

6. Subject Pharmacies compliance policies, manuals, and training;
7. correspondence and communications with Medicare, its contractors, Medicaid, and insurance carriers;
8. correspondence and communications with Subject Pharmacies' employees, agents, representatives, contractors, and customers concerning Subject Pharmacies' business;
9. correspondence and communications with government agencies, auditors, inspectors, pharmaceutical wholesalers or accreditation entities;
- 10.the identity of the person or persons who have owned or operated the rkouza@gmail.com, ramiskouza@gmail.com, erdrugtaylor@gmail.com, and justinjarbo@gmail.com_email accounts, or any associated email accounts;
- 11.the existence and identity of any co-conspirators;
- 12.the identity, location, and ownership of computers used to access the rkouza@gmail.com, ramiskouza@gmail.com, erdrugtaylor@gmail.com, and justinjarbo@gmail.com email accounts;

13.other email or Internet accounts providing Internet access or remote data storage;

14.the existence or location of physical media storing electronic data, such as hard drives, CD- or DVD-ROMs, or thumb drives; and

15.the existence or location of paper print-outs of any data from any of the above.

B. All of the subscriber, transactional, and logging records described in Section II(B).

CERTIFICATE OF AUTHENTICITY OF
DOMESTIC BUSINESS RECORDS
PURSUANT TO FEDERAL RULE OF
EVIDENCE 902(11)

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Google, and my official title is _____. I am a custodian of records for Google. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Google, and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

- a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;
- b. such records were kept in the ordinary course of a regularly conducted business activity of Google; and
- c. such records were made by Google as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.

Date

Signature